



Permit

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

PIEDMONT REGIONAL OFFICE

4949-A Cox Road, Glen Allen, Virginia 23060

(804) 527-5020 Fax (804) 527-5106

www.deq.virginia.gov

Douglas W. Domenech
Secretary of Natural Resources

David K. Paylor
Director

Michael P. Murphy
Regional Director

May 17, 2010

Mrs. Pamela Faggert
Vice President and Chief Environmental Officer
Dominion Resources
5000 Dominion Boulevard
Glen Allen, VA 23060

Location: County of Surry
Registration No.: PRO50336
County-Plant ID No. 51-181-0002

Dear Mrs. Faggert:

Attached is a permit to operate your Fossil Fuel Electric Power Generation Facility pursuant to 9 VAC 5 Chapter 80 of the Virginia Regulations for the Control and Abatement of Air Pollution. This permit incorporates provisions from the permits dated September 27, 1993 and December 15, 2009 and supersedes the Title V Federal Operating Permit issued on March 30, 2004 and amended on June 12, 2006.

This permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and civil penalty. Please read all permit conditions carefully.

In the course of evaluating the application and arriving at a final decision to approve the project, the Department of Environmental Quality (DEQ) deemed the application complete on September 25, 2008 and solicited written public comments by placing a newspaper advertisement in Style Weekly on March 24, 2010.

This approval to operate shall not relieve Dominion Resources of the responsibility to comply with all other local, state, and federal permit regulations.

Issuance of this permit is a case decision. The Regulations, at 9 VAC 5-170-200, provide that you may request a formal hearing from this case decision by filing a petition with the Board within 30 days after this permit is mailed or delivered to you. Please consult that and other relevant provisions for additional requirements for such requests.

As provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date of service of this decision (the date you actually received this decision or the date on which it was mailed to you, whichever occurred first), within which to initiate an appeal of this decision by filing a Notice of Appeal with:

David K. Paylor, Director
Department of Environmental Quality
P. O. Box 10009
Richmond, VA 23240-0009

In the event that this decision is served on you by mail, three days are added to the period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for information on the required content of the Notice of Appeal and for additional requirements governing appeals from decisions of administrative agencies.

If you have any questions concerning this permit, please call the Piedmont Regional Office at (804) 527-5020.

Sincerely,



James E. Kyle, P.E.
Air Permit Manager

JEK/ROS/50336TVrenewal

Attachment: Permit

- c. Director, OAPP (electronic file submission)
Manager, Data Analysis (electronic file submission)
Chief, Air Enforcement Branch (3AP13), U.S. EPA, Region III



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Federal Operating Permit Article 1

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1, and Chapter 140 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300, and 9 VAC 5-140-10 through 9 VAC 5-140-900 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name:	Virginia Electric and Power Company
Facility Name:	Dominion - Gravel Neck/Surry Power Stations
Facility Location:	Route 650, Surry, Virginia
Registration Number:	50336
Permit Number:	PRO50336

This permit includes the following programs:

Federally Enforceable Requirements - Clean Air Act (Sections I through VII)

Federally Enforceable Requirements- Clean Air Interstate Rule (Section VIII)

May 17, 2010
Effective Date

May 17, 2015
Expiration Date

Kyle Ivar Winter, P.E.
Deputy Regional Director

5/17/10
Signature Date

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I. Facility Information

Permittee

Virginia Electric and Power Co.
5000 Dominion Boulevard
Glen Allen, VA 23060

Responsible Official

G.T. Bischof
Site Vice President (Surry)

Dave Snoddy
Station Director (Gravel Neck)

Facility

Dominion Gravel Neck/Surry Power Stations
Route 650
Surry, VA, 23883

Contact Person

Ms. Cathy C. Taylor
Director Electric Environmental Services
(804) 273-2929

County-Plant Identification Number: 51-181-0002

ORIS Code: 7032

NATS Facility Identification Number: 007032

Facility Description: NAICS 221112 - Fossil Fuel Electric Power Generation
SIC 4911- Electric Services

The Gravel Neck and Surry Power Stations are two separate electric power generating facilities under common ownership located on contiguous properties. The Surry Power Station is a nuclear powered electric generating facility. The two nuclear reactors are regulated by the US Nuclear Regulatory Commission (NRC). There are two 90.6 MMBtu/hr Babcock & Wilcox distillate oil-fired backup boilers at the Surry site, each capable of producing 80,000 pounds of steam per hour. These backup boilers were constructed in 1969 and are subject to the existing source regulations (9 VAC 5 Chapter 40). There is one Caterpillar 3600 series diesel back up electric generator with a rated nominal capacity of 4640 HP and there are three back up electric generators with a rated nominal capacity of 3950 HP each.

The Gravel Neck station is a natural gas and distillate oil-fired peaking power plant consisting of six combustion turbines. Two of the turbines are Westinghouse units rated at 281.3 MMBtu/hr and 363.3 MMBtu/hr. These two units were constructed in 1970 and are equipped with diesel starter engines rated at 2.35 MMBtu/hr and 4.59 MMBtu/hr. The remaining four turbines are General Electric (GE) Model PG71111 simple cycle combustion turbines constructed in 1989, each nominally rated at 1,300 MMBtu/hr. The primary fuel for the GE turbines is natural gas and the secondary fuel is distillate oil. The four GE turbines are subject to 40 CFR 60 (NSPS) Subpart GG- *Standards of Performance for Stationary Gas Turbines* and operate under a NSR permit issued December 15, 2009.

None of the units at the Gravel Neck / Surry Power Station are subject to the provisions of the Phase II Acid Rain Program (40 CFR Part 72); however, the facility is subject to the CAIR NO_x Annual Budget Trading Program (9 VAC 5 Chapter 140) and the Clean Air Interstate Rule (40 CFR Part 96 Subpart AA, CAIR).

II. Emission Units

Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Nominal Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled
Fuel Burning Equipment						
Surry Power Station						
ES - 101	EP-101	Unit A Babcock & Wilcox Oil-Fired Boiler	90.6 MMBtu/hr			
ES - 102	EP-102	Unit B Babcock & Wilcox Oil-Fired Boiler	90.6 MMBtu/hr			
IS - 101	IP-101	Caterpillar 3600 Series Diesel Backup Electric Generator	4640 HP			
IS - 102	IP-102	(3) Backup Electric Generators	3950 HP each			
Gravel Neck Combustion Turbine Station						
ES - 1A (oil)	EP-1	Unit 1 - Westinghouse 191 Combustion Turbine	281.3 MMBtu/hr			
ES - 1B(gas)						
ES - 2A (oil)	EP-2	Unit 2 - Westinghouse 251 Combustion Turbine	363.3 MMBtu/hr			
ES - 2B (gas)						
ES - 3A (gas)	EP-3	Unit 3 - General Electric PG 7111-EA Combustion Turbine	1308 MMBtu/hr (gas)	Water Injection	CD-3	NO _x
ES - 3B (oil)			1246 MMBtu/hr (oil)			
ES - 4A (gas)	EP-4	Unit 4 - General Electric PG 7111-EA Combustion Turbine	1308 MMBtu/hr (gas)	Water Injection	CD-4	NO _x
ES - 4B (oil)			1246 MMBtu/hr (oil)			
ES - 5A (gas)	EP-5	Unit 5 - General Electric PG 7111-EA Combustion Turbine	1308 MMBtu/hr (gas)	Water Injection	CD-5	NO _x
ES - 5B (oil)			1246 MMBtu/hr (oil)			
ES - 6A (gas)	EP-6	Unit 6 - General Electric PG 7111-EA Combustion Turbine	1308 MMBtu/hr (gas)	Water Injection	CD-6	NO _x
ES - 6B (oil)			1246 MMBtu/hr (oil)			
ES - 7	EP-7	Unit 1 Starter Diesel Engine	2.35 MMBtu/hr			
ES - 8	EP-8	Unit 2 Starter Diesel Engine	4.59 MMBtu/hr			

*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

III. Fuel Burning Equipment Requirements – (Surry & Gravel Neck Power Stations)

A. Limitations

1. Emissions from the operation of the two (2) Babcock & Wilcox distillate oil-fired boilers (ES-101 and ES-102), each rated at 90.6 MMBtu/hr, shall not exceed the following:

	<u>lbs/MMBtu</u>
PM (TSP)	0.28
PM ₁₀	0.28
SO ₂	2.64

(9 VAC 5-40-900 A.1, 9 VAC 5-40-930 A.1, and 9 VAC 5-80-110 B)

2. Visible emissions from the two (2) 90.6 MMBtu/hr Babcock & Wilcox distillate oil-fired boiler (ES-101 and ES-102) stacks shall not exceed 20 percent opacity, except during one six-minute period in any one hour in which visible emissions shall not exceed 60 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-40-940 and 9 VAC 5-80-110 B)
3. The Caterpillar 3600 series diesel electric generator (IS-101) is to be used only for providing power at the Surry Power Station during interruption of service from the normal power supplier and for periodic testing.
(9 VAC 5-80-110B and NSR Permit issued 9/27/93)
4. Emissions from the operation of the Caterpillar 3600 series diesel electric generator (IS-101) and the three (3) 3950 HP Diesel-Powered Backup Generators (IS-102), shall not exceed the following:

SO ₂	2.64 lbs/MMBtu
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(9 VAC 5-40-280 B, 9 VAC 5-50-10, and 9 VAC 5-80-110 B)
5. Visible Emissions from the Westinghouse 191 and 251 combustion turbines (ES-1 and ES-2) and their associated starter diesel engines (ES-7 and ES-8) shall not exceed 20 percent opacity except for one six-minute period in any one hour of not more than 60% opacity.
(9 VAC 5-40-80)
6. Nitrogen oxide (NO_x) emissions from the four (4) General Electric Model PG7111 simple cycle combustion turbines (ES-3, ES-4, ES-5, and ES-6) shall be controlled by the utilization of water injection when firing Natural Gas and No.2 distillate fuel oil. The simple cycle combustion turbines shall be provided with adequate access for inspection.

(9 VAC 5-80-10, 9 VAC 5-50-260, 9 VAC 5-80-110 and Condition 3 of the NSR permit issued 12/15/09)

7. Sulfur dioxide emissions from the four (4) General Electric Model PG7111 simple cycle combustion turbines (ES-3, ES-4, ES-5, and ES-6) shall be controlled by the use of low sulfur fuels.
(9 VAC 5-80-10, 9 VAC 5-50-260, 9 VAC 5-80-110 and Condition 4 of the NSR permit issued 12/15/09)
8. Particulate matter (PM) emissions from the four (4) General Electric Model PG7111 simple cycle combustion turbines (ES-3, ES-4, ES-5, and ES-6) shall be controlled by the use of clean burning fuels and good combustion operating practices.
(9 VAC 5-80-10, 9 VAC 5-50-260, 9 VAC 5-80-110 and Condition 5 of the NSR permit issued 12/15/09)
9. Volatile organic compounds and carbon monoxide emissions from the four (4) General Electric Model PG7111 simple cycle combustion turbines (ES-3, ES-4, ES-5, and ES-6) shall be controlled by the use of good combustion operating practices.
(9 VAC 5-80-10, 9 VAC 5-50-260, 9 VAC 5-80-110 and Condition 6 of the NSR permit issued 12/15/09)
10. To comply with this permit and to avoid the applicability of 9 VAC 5-80 *Permits – Major Stationary Sources and Major Modifications Locating in Prevention of Significant Deterioration Areas*, the permitted facility (ES-3, ES-4, ES-5 and ES-6) shall not exceed 137.2 tons of nitrogen oxide (NOx) emissions or 120.1 tons of sulfur dioxide (SO2) emissions during the warm weather months of each year. The warm months are defined as the period from the first of April until the end of October of each year.
 - a. Operating restrictions – the combustion turbine inlet air cooling system and the wet compression system for each of the four (4) General Electric Model PG7111 turbines shall only be operated if ambient air temperatures exceed 60 degrees Fahrenheit and the turbines are operating at a minimum of 60 MW (or above) electrical load.
 - b. Record Keeping - the permittee shall keep records of the electrical generation of the facility while the inlet cooling systems are operating. The permittee shall keep these records on file and shall make them available upon request by the Director, Piedmont Regional Office.
 - c. Reporting Requirements - the permittee shall report to the Director, Piedmont Regional Office by November 30 of each year the actual emissions of NOx and SO2 emitted during the warm months of each year.

- d. The permittee shall determine the actual NO_x and SO₂ emissions in proportion to the electrical generation of the facility while the inlet cooling systems are operating during the warm months of each year. The NO_x calculations shall be based on the most recent emission tests from similar units (same manufacturer and model number). The SO₂ calculations may be based on fuel sulfur content and actual quantities of fuel burned or actual electrical generation while the inlet cooling systems are operating during the warm months of each year.

(9 VAC 5-80-1605 and Condition 7 of the NSR permit issued 12/15/09)

11. Short-term emission limits from the operation of each of the General Electric Model PG7111-EA simple cycle combustion turbines (ES-3, ES-4, ES-5, and ES-6) while fired on natural gas shall not exceed the limits specified below (except during start-up, shutdown and malfunction conditions):

PM	5.37×10^{-3} lbs/MMBtu	6.2 lbs/hr
PM10	5.37×10^{-3} lbs/MMBtu	6.2 lbs/hr
SO ₂	5.20×10^{-2} lbs/MMBtu	66.9 lbs/hr
VOC		2.0 lbs/hr
Carbon monoxide		26.2 lbs/hr
Nitrogen oxides	42 ppmdv @ 15% O ₂ (1-hour average)	196.9 lbs/hr

(9 VAC 5-50-260 9 VAC 5-80-110, and Condition 8 of the NSR permit issued 12/15/09)

12. Short-term emission limits from the operation of each of the General Electric Model PG7111-EA simple cycle combustion turbines (ES-3, ES-4, ES-5, and ES-6) while fired on No. 2 distillate fuel oil shall not exceed the limits specified below (except during start-up, shutdown and malfunction conditions):

PM	1.23×10^{-2} lbs/10 ⁶ Btu	12.5 lbs/hr
PM10	1.23×10^{-2} lbs/10 ⁶ Btu	12.5 lbs/hr
SO ₂	0.307 lbs/10 ⁶ Btu	380.0 lbs/hr
VOC		6.3 lbs/hr
Carbon monoxide		28.5 lbs/hr
Nitrogen oxides (Fuel Bound Nitrogen less than 0.015% by weight)		
	* 65 ppmdv @ 15% O ₂ (1-hour average)	320.4 lbs/hr
Nitrogen oxides (Fuel Bound Nitrogen less than or equal to 0.05% by weight)		
	* 77 ppmdv @ 15% O ₂ (1-hour average)	380.0 lbs/hr
	*See Condition 15.	

Lead		2.0×10^{-2} lbs/hr
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(9 VAC 5-50-260, 9 VAC 5-80-110, and Condition 9 of the NSR permit issued 12/15/09)

13. The terms “start-up” and “shutdown” shall be defined as follows:

Start-up: the period, for each start command, from the beginning of “warm-up” control mode or from the point a restart is issued for a running unit in shutdown mode and continuing to the end of the first hour of water injection logging for NO_x control.

Shutdown: the period, for each unit stop command, from when the control “shutdown” mode begins and continuing until no fuel is being combusted or until a restart command is received, whichever occurs first.

(9 VAC 5-170-160 and Condition 10 of the NSR Permit issued 12/15/09)

14. Annual emissions from each General Electric Model PG7111-EA Simple Cycle Combustion Turbine (ES-3, ES-4, ES-5, and ES-6) shall not exceed the limits specified below:

PM	11.7 tons/yr
PM10	11.7 tons/yr
SO ₂	245.5 tons/yr
VOC	4.9 tons/yr
Carbon monoxide	36.0 tons/yr
Nitrogen oxides	246.0 tons/yr

(9 VAC 5-50-260 9 VAC 5-80-110, and Condition 11 of the NSR permit issued 12/15/09)

15. The combined annual nitrogen oxides emission rate for each General Electric Model PG7111-EA Simple Cycle Combustion Turbine (ES-3, ES-4, ES-5, and ES-6) firing a combination of natural gas and low sulfur fuel oil shall not exceed a total of 246 tons per year, calculated monthly as the sum of each consecutive 12 month period.

(9 VAC 5-50-260, 9 VAC 5-80-110, and Condition 12 of the NSR permit issued 12/15/09)

16. The four simple cycle combustion turbines (Ref. Nos. ES-3, ES-4, ES-5, and ES-6) combined shall not consume more than the following quantities of natural gas and No. 2 distillate oil fuel annually, calculated monthly as the sum of each consecutive 12 month period:

- a. Natural gas – 3,100,000,000 scf annually when firing natural gas 100% of the time.
- b. No. 2 distillate oil – $13,700,000 - 2,200,000 * (S - 0.25)/0.05$ gallons annually when firing No. 2 distillate oil 100% of the time. Sulfur (S) is equal to % S by weight annual average, but not less than 0.25% firing No. 2 distillate oil 100% of the time.

- c. No. 2 distillate oil – $13,700,000 - 2,200,000 * (FBN - 0.015)/0.035$ gallons annually when firing No. 2 distillate oil 100% of the time. Fuel Bound Nitrogen (FBN) is equal to % FBN by weight annual average, but not less than 0.015% firing No. 2 distillate oil 100% of the time.
 - d. When the four simple cycle combustion turbines are firing both No. 2 distillate oil and natural gas during the period individually or in combination, the annual consumption shall be limited by the following equation to limit NO_x and SO₂ to less than 249.5 tons per year, where: (scf natural gas used/ 3,100,000,000 scf) + (gallons of No. 2 distillate oil used/ No.2 distillate oil limit in gallons from b.) is less than or equal to 1.
 - * Distillate oil limit to be determined by c. above.(9 VAC 5-50-160, 5-50-170, and Condition 13 of the NSR Permit issued 12/15/09)
17. The approved fuels for the four (4) General Electric Model PG7111 simple cycle combustion turbines (Ref. Nos. ES-3, ES-4, ES-5, and ES-6) are pipeline quality natural gas (primary fuel) and No. 2 distillate fuel oil (back-up fuel). Distillate oil is defined as fuel oil that meets the specifications for fuel oil numbers 1 or 2 under the American Society for Testing and Materials, ASTM D396 - "Standard Specification for Fuel Oils" or another approved ASTM method as incorporated by reference in 40 CFR 60 Subpart GG. A change in the fuels may require a permit to modify and operate. (9 VAC 5-80-110 and Condition 14 of the NSR Permit issued 12/15/09)
18. The maximum sulfur content of the natural gas to be burned in the four (4) General Electric Model PG7111 simple cycle combustion turbines (Ref. Nos. ES-3, ES-4, ES-5, and ES-6) shall not exceed 0.06 weight percent per 100 dry standard cubic feet. (9 VAC 5-50-410, 9 VAC 5-80-110, and Condition 15 of the NSR Permit issued 12/15/09)
19. The maximum sulfur content of the distillate oil to be burned in the four (4) General Electric Model PG7111 simple cycle combustion turbines (Ref. Nos. ES-3, ES-4, ES-5, and ES-6) shall not exceed 0.20 weight percent per shipment. The maximum Fuel Bound Nitrogen (FBN) content of the oil to be burned in the four (4) General Electric Model PG7111 simple cycle combustion turbines (Ref. Nos. ES-3, ES-4, ES-5, and ES-6) shall not exceed 0.05 weight increase per shipment. (9 VAC 5-170-160, 9 VAC 5-80-110, and Condition 16 of the NSR Permit issued 12/15/09)
20. The Visible emissions (VE) from the four (4) General Electric Model PG7111 simple cycle combustion turbine's (Ref. Nos. ES-3, ES-4, ES-5, and ES-6) exhaust stack shall not exceed ten (10) percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed thirty (30) percent opacity as determined by the Environmental Protection Agency's (EPA) Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.

(9 VAC 5-50-260, 9 VAC 5-50-80, 9 VAC 5-80-110, and Condition 17 of the NSR Permit issued 12/15/09)

21. Except as specified in this permit the four (4) General Electric Model PG7111 simple cycle combustion turbines (ES-3, ES-4, ES-5, and ES-6) are to be operated in compliance with all applicable requirements of 40 CFR Part 60, Subpart GG - *Standards of Performance for Stationary Gas Turbines*.
(9 VAC 5-50-410, 9 VAC 5-80-110, and Condition 27 of 12/15/09 permit)

B. Monitoring

1. The permittee shall monitor the sulfur content of the natural gas being fired in the four (4) General Electric Model PG711-EA simple cycle combustion turbines (ES-3, ES-4, ES-5, and ES-6), in accordance with subpart GG of the NSPS and the US EPA approved custom fuel monitoring schedule. These records shall be available on site for inspection by the DEQ and kept on file for the most current five-year period.
(9 VAC 5-50-410, 9 VAC 5-80-110, and Condition 19 of the NSR Permit issued 12/15/09)
2. The permittee shall not be required to monitor the nitrogen content of the natural gas being fired in the four (4) General Electric Model PG7111 simple cycle combustion turbine (Ref. Nos. ES-3, ES-4, ES-5, and ES-6), in accordance with subpart GG of the NSPS. Fuel monitoring for the nitrogen content of the natural gas fuel (required by NSPS Subpart GG) has been waived, by the Administrator of the US EPA in the US EPA custom fuel monitoring schedule, approved on July 2, 1998.
(9 VAC 5-170-160, 9 VAC 5-80-110, and Condition 20 of the NSR Permit issued 12/15/09)
3. The permittee shall test the No. 2 distillate fuel oil storage tanks that supply the four (4) General Electric Model PG7111 (Ref. Nos. ES-3, ES-4, ES-5, ES-6) to determine the sulfur and nitrogen content on each occasion that fuel is transferred (as referenced in Appendix A) to the storage tank, from any other source or fuel vendor. Fuel oil sulfur content shall be determined using ASTM D396 or another approved ASTM method incorporated in 40 CFR 60 by reference. Fuel oil nitrogen content shall be determined by following current ASTM procedures approved by the Administrator of the US EPA. Records of fuel oil sulfur and nitrogen content shall be available on site for inspection by DEQ personnel. They shall be kept on file for the most current five-year period.
(9 VAC 5-50-410, 9 VAC 5-80-110, 40 CFR 60 Subpart GG, and Condition 21 of the NSR Permit issued 12/15/09)
4. The permittee shall perform visible emissions observations (VEO's) on the exhaust stack of each General Electric Model PG711-EA simple cycle combustion turbine (ES-3, ES-4, ES-5, and ES-6) according to the following schedule:

<u>Operating Schedule/History</u>	<u>Observation Frequency</u>
a. < 20 hrs / yr	No Evaluations Required
b. 20 hrs / yr < hours operated < 200 hrs / yr	Once per year
c. hours operated > 200 hrs / yr	Once every 200 hours

Each VEO shall be performed for a sufficient period of time to identify the presence of visible emissions. If no visible emissions are observed, no action shall be required. However, if visible emissions are observed, a visible emissions evaluation (VEE) shall be conducted using 40 CFR Part 60, Appendix A, Method 9 for a period of not less than 6-minutes. If the average opacity exceeds 10%, modifications and/or repairs shall be performed to correct the problem and the corrective measures shall be recorded. If such corrective action fails to remedy the opacity problem, a VEE in accordance with 40 CFR Part 60, Appendix A, Method 9, shall be performed for a period of at least 18 minutes to determine compliance with the opacity limits specified in Condition III.A.19 of this permit. The VEE observer shall be Method 9 certified.

(9 VAC 5-80-110 K)

5. The permittee shall perform visible emissions observations (VEO's) on the exhaust stacks of the Babcock & Wilcox Oil-Fired Boilers (Unit Ref. No.'s ES-101 and ES-102), the 4640 HP Caterpillar 3600 Diesel-Powered Backup Generator (IS-101), the three (3) 3950 HP Diesel-Powered Backup Generators (IS-102), and the Westinghouse model 191 and 251 combustion turbines (Unit Ref. No.'s ES-1 and ES-2) according to the following schedule:

<u>Operating Schedule/History</u>	<u>Observation Frequency</u>
a. < 20 hrs / yr	No Evaluations Required
b. 20 hrs / yr < hours operated < 200 hrs / yr	Once per year
c. hours operated > 200 hrs / yr	Once every 200 hours

Each VEO shall be performed for a sufficient period of time to identify the presence of visible emissions. If visible emissions are observed, a Method 9 certified observer shall conduct a VEO. If visible emissions do not appear to exceed ten percent (10%) opacity, no action shall be required. However, if the observed visible emissions appear to exceed ten percent opacity, a visible emission evaluation (VEE) shall be conducted using 40 CFR Part 60, Appendix A, Method 9 for a period of not less than 6-minutes. If the average opacity exceeds 20%, modifications and/or repairs shall be performed to correct the problem and the corrective measures shall be recorded. If

such corrective action fails to remedy the opacity problem, a VEE in accordance with 40 CFR Part 60, Appendix A, Method 9, shall be performed for a period of at least 18 minutes to determine compliance with the opacity limits specified in Conditions III.A.2 and III.A.5 of this permit. The VEE shall be EPA Method 9 certified. (9 VAC 5-80-110 K)

6. A continuous monitoring system shall be installed and operated to indicate/determine and record the hourly fuel consumption (in pounds/second) and the ratio of water to fuel oil being fired in the four (4) General Electric Model PG7111 simple cycle combustion turbines (CT). The system shall be accurate to within ± 5.0 percent. The monitoring system shall be operated at all times that water is being injected into the four (4) General Electric Model PG7111 simple cycle combustion turbines (CT). The monitoring system shall be maintained and calibrated in accordance with the manufacturer's specifications. The Permittee shall maintain the records of the four (4) General Electric Model PG7111 simple cycle combustion turbine (CT) fuel oil consumption and ratio of water to fuel oil being fired at the site. These records shall be kept on file for the most current five year period and available for inspection by DEQ personnel.
(NSPS Subpart GG, 9 VAC 5-50-50 and 9 VAC 5-170-160, and Condition 22 of the NSR Permit issued 12/15/09)

7. **Compliance Assurance Monitoring (CAM)** - The permittee shall monitor, operate, calibrate and maintain the water injection controlling the simple cycle combustion (Ref. Nos. ES-3, ES-4, ES-5, and ES-6) turbines according to the following:

Monitoring, Frequency, Records	Performance Criteria	Indicator Range; Averaging Period
<ul style="list-style-type: none"> Continuously monitor fuel consumption and the water-to-fuel ratio. Records shall be collected by a computerized system. The system shall collect and retain all relevant data. 	<ul style="list-style-type: none"> Fuel and water flow meters to have minimum accuracy of 5% and to be calibrated prior to each stack testing event. 	<ul style="list-style-type: none"> Indicator range: Shown in the table below. Excursion: Water-to-fuel ratio outside the indicator range averaged over a 1-hour block period. Data points shall be collected every minute, at a minimum, averaged over a 1-hour block period.

Indicator Range for Water-to-Fuel Ratio	
Load, percent	Water-to-Fuel Ratio Indicator Range
50	Greater than 0.20
75	Greater than 0.30
100	Greater than 0.50

8. **Compliance Assurance Monitoring (CAM)** - The permittee shall conduct the monitoring and fulfill the other obligations specified in 40 CFR 64.7 through 40 CFR 64.9.
(9 VAC 5-80-110 E and 40 CFR 64.6(c))
9. **Compliance Assurance Monitoring (CAM)** - At all times, the permittee shall maintain the monitoring equipment, including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
(9 VAC 5-80-110 E and 40 CFR 64.7(b))
10. **Compliance Assurance Monitoring (CAM)** - Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the simple cycle combustion turbines are operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of compliance assurance monitoring, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by inadequate maintenance or improper operation are not malfunctions.
(9 VAC 5-80-110 E and 40 CFR 64.7(c))
11. **Compliance Assurance Monitoring (CAM)** - Upon detecting an excursion or exceedance, the permittee shall restore operation of the simple cycle combustion turbines (Ref. Nos. ES-3, ES-4, ES-5, and ES-6) (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup and shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator, designated condition, or below the applicable emission limitation or standard, as applicable.
(9 VAC 5-80-110 E and 40 CFR 64.7(d)(1))

- 12. Compliance Assurance Monitoring (CAM)** - Determination that acceptable procedures were used in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.
(9 VAC 5-80-110 E and 40 CFR 64.7(d)(2))
- 13. Compliance Assurance Monitoring (CAM)** - If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the Director, Piedmont Regional Office and, if necessary, submit a proposed modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
(9 VAC 5-80-110 E and 40 CFR 64.7(e))
- 14. Compliance Assurance Monitoring (CAM)** - If the number of exceedances or excursions exceeds 5 percent duration of the operating time for the simple cycle combustion turbines for a semiannual reporting period, the permittee shall develop, implement and maintain a Quality Improvement Plan (QIP) in accordance with 40 CFR 64.8. If a QIP is required, the permittee shall have it available for inspection. The QIP initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the permittee shall modify the plan to include procedures for conducting one or more of the following, as appropriate:
- a. Improved preventative maintenance practices;
 - b. Process operation changes;
 - c. Appropriate improvements to control methods;
 - d. Other steps appropriate to correct control performance; and
 - e. More frequent or improved monitoring.
- (9 VAC 5-80-110 E and 40 CFR 64.8(a) and (b))
- 15.** The continuous water to fuel ratio monitor required by this permit, the continuous monitoring data, and the quality assurance data shall, at the discretion of the Board, be used to determine compliance with the NO_x emission limits and/or relevant emission standards. Each monitor is subject to such data capture requirements and/or quality

assurance requirements as specified in this permit and as may be deemed appropriate by the Board (40 CFR 60.13 and 40 CFR 60 Appendix B).
(9 VAC 5-80-110 and Condition 29 of the NSR Permit issued 12/15/09)

C. Recordkeeping

1. The permittee shall keep records of the electrical generation of the four (4) simple cycle combustion turbines (ES-3, ES-4, ES-5, and ES-6) while the inlet cooling systems are operating in order to demonstrate compliance with Condition III E. 3. The permittee shall keep these records on file and shall make them available upon request by the Director, Piedmont Regional Office.
(9 VAC 5-80-1605 and 9 VAC 5-80-110)
2. A record of each visible emissions observation and visible emissions evaluation shall be maintained and shall include, at a minimum, the date, time, name of the emission unit, the applicable visible emissions requirement, the results of the observation, and the name of the observer.
(9 VAC 5-80-110 K)
3. The permittee shall maintain records of all emission data and operating parameters required to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Piedmont Regional Office (PRO) of the DEQ.
(9 VAC 5-50-50, 9 VAC 5-60-50, 9 VAC 5-80-110, and Condition 26 of the NSR Permit issued 12/15/09)
4. **Compliance Assurance Monitoring (CAM) Recordkeeping** - The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan (QIP) required pursuant to §64.8 and any activities undertaken to implement a quality improvement plan (QIP), and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).
(9 VAC 5-80-110 E and 40 CFR 64.9(b))

D. Testing

1. The permitted facility shall be constructed so as to allow for emissions testing upon reasonable notice at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.
(9 VAC 5-50-30, 9 VAC 5-80-110, and Condition 18 of the NSR permit issued 12/15/09)
2. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Regulated Pollutant	Reference Method
VOC	EPA Methods 18, 25, 25a
NO _x	EPA Method 7
SO ₂	EPA Method 6
CO	EPA Method 10
PM/PM ₁₀	EPA Methods 5, 202 / 17, 201A
Visible Emissions	EPA Method 9

The Department and EPA have the authority to require testing not included in this permit, if necessary to determine compliance with an emission limit or standard. Alternative test methods may be used upon written approval from the Director. (9 VAC 5-80-110)

3. The continuous fuel to water ratio monitoring system shall be operational prior to conducting performance tests under 9 VAC 5-50-30 and 9 VAC 5-60-30. Performance evaluations of the continuous fuel to water ratio monitoring system during the initial commissioning of the monitoring system shall take place within 30 days prior to or during the performance tests under 9 VAC 5-50-30 and 9 VAC 5-60-30. The DEQ Piedmont Regional Office (PRO) shall be furnished with two copies of the report of the performance evaluations within 60 days of the evaluation.
(9 VAC 5-50-40, 9 VAC 5-60-40, and Condition 23 of the NSR permit issued 12/15/09)
4. The permittee may use representative testing between the four simple cycle combustion turbines (Ref. Nos. ES-3, ES-4, ES-5 and ES-6) at Dominion – Gravel Neck (Reg. No. 50336) and the four simple cycle combustion turbines (Ref. Nos. ES-1, ES-2, ES-3 and ES-4) at Dominion – Darbytown (Reg. No. 50997) under the following conditions:
 - a. The permittee demonstrates that each of the combustion turbines at both facilities are low mass emission units as defined in 40 CFR 72.2 and 40 CFR 75.19 (a)(1)(i).
 - b. The permittee demonstrates that each of the units in the group (both facilities) are identical according to the following criteria in 40 CFR 75.19 (c)(1)(iv)(B)(1):
 1. Same size based on maximum rated heat input
 2. Manufacturer and model
 3. Same history of modification (having the same controls installed, same types of burners and have undergone major overhauls at the same frequency (based on hours of operation)
 4. Under similar operating conditions, the stack or turbine outlet temperature of each unit must be within 50 plus or minus degree Fahrenheit of the average stack or turbine outlet temperature for all of the units.

- c. If the permittee cannot meet the criteria in 40 CFR 75. (c)(1)(iv)(B)(1), then the group of low mass emission units is not considered an identical group of units and individual appendix E testing of each unit is required as described by 40 CFR 75 (c)(1)(iv)(B)(4).
- d. The permittee shall test three (3) of the eight (8) identical combustion turbines each test cycle. The eight identical units consist of the four simple cycle combustion turbines (Ref. Nos. ES-3, ES-4, ES-5 and ES-6) at Dominion Gravel Neck (Reg. No. 50336) and the four simple cycle combustion turbines (Ref. Nos. ES-1, ES-2, ES-3 and ES-4) at Dominion – Darbytown (Reg. No. 50997). The testing shall be performed at least once every 20 operating quarters as defined in 40 CFR Part 75 Appendix E.2.2. The permittee shall conduct the low mass emission (LME) test that is due before the end of the next cycle which ends in 2012 at Dominion – Gravel Neck (Reg. No. 50336) and then continue to test units in a selection process so that no individual units goes untested before repeating testing on the same unit in subsequent years.

(9 VAC 5-50-30, 9 VAC 5-80-1200, 9 VAC 5-50-410, 40 CFR 72.2 and 40 CFR 75.19 (a)(1)(i) and Condition 28 of the NSR permit issued 12/15/09)

E. Reporting

1. The permittee shall submit quarterly excess emission reports to the Piedmont Regional Office (PRO) of the DEQ within 30 days after the end of each calendar quarter or semi-annually as needed. Details of the quarterly reports are to be arranged with the Piedmont Regional Office (PRO). Each quarterly report shall cover, at a minimum, the dates included in the calendar quarter and provide the following information for each day in the quarter, report each hour during which the water to fuel ratio fell below that required to demonstrate compliance with the nitrogen oxides permit limit, copy of the written notification and corrective action taken. The report shall include the following for each period described above: start time, duration, actual and required water-to-fuel ratio, fuel type and consumption rate, nitrogen content of fuel oil (if oil-fired), ambient temperature and the four (4) General Electric Model PG7111 simple cycle combustion turbine load. If, during the calendar quarter, there are no times when the water to fuel injection ratio fell below that required to demonstrate compliance, the permittee shall state in the quarterly report that no such events occurred during the affected calendar quarter.
(9 VAC 5-50-50, 9 VAC 5-80-110, and Condition 25 of the NSR permit issued 12/15/09)
2. **Compliance Assurance Monitoring (CAM) Reporting** - the permittee shall submit CAM reports as part of the Title V quarterly or semi-annual monitoring reports required by Condition III.E.1. and General Condition C.3. of this permit to the

Director, Piedmont Regional Office. Such reports shall include at a minimum:

- a. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- b. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- c. A description of the actions taken to implement a quality improvement plan (QIP) during the reporting period as specified in §64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

(9 VAC 5-80-110 F and 40 CFR 64.9(a))

3. For a period of five years following the resumption of regular operations after installation of the wet compression systems, the permittee shall submit a report to the Piedmont Regional Office (PRO) of DEQ if the annual emissions, in tons per year, resulting from the construction and operation of the four wet compression systems (ES-3, ES-4, ES-5 and ES-6) exceed the baseline actual emissions by a significant amount for that regulated pollutant and if such emissions differ from the preconstruction projection. Such report shall be submitted to PRO within 60 days after the end of the year and shall comply with the applicable requirements of 9 VAC 5-80-1785.

(9 VAC 5-80-1785 and Condition 40 of NSR permit issued 12/15/09)

4. Pursuant to 40 CFR 60.4, the permittee shall submit copies of all requests, reports, applications, submittals and other communications to both EPA and the Director, Piedmont Regional Office. The EPA copies shall be forwarded to:

Air Enforcement Branch, Mail Code 3AP12
US EPA, Region III
1650 Arch Street
Philadelphia, PA 19103-2029
(9 VAC 5-80-110 F)

IV. Facility Wide Conditions

A. Monitoring

1. In order to minimize the duration and frequency of excess emissions due to malfunctions of process equipment or air pollution control equipment, the permittee shall:
 - a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance. These records shall be maintained on site for a period of five (5) years and shall be made available to DEQ personnel upon request.
 - b. Maintain a suitable inventory of spare parts to minimize the duration of air pollution control equipment breakdowns.
(9 VAC 5-80-110 and Condition 33 of NSR permit issued 12/15/09)
2. The permittee shall maintain on site written operating procedures for the related air pollution control equipment. Operators shall be trained in the proper operation of all such equipment and shall be familiar with the written operating procedures. These procedures shall be based on the manufacturer's recommendations, at minimum. The permittee shall maintain records of training provided, including names of trainees, date of training, and nature of training.
(9 VAC 5-80-110 and Condition 34 of NSR permit issued 12/15/09)

B. Recordkeeping

1. The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Piedmont Regional Office. These records shall include, but are not limited to:
 - a. Continuous megawatt generation rate during the period in which the Inlet Air Conditioning Systems and Wet Compression Systems are in operation.
 - b. Hourly, monthly, and annual consumption of natural gas and fuel oil. Annual consumption to be calculated monthly as the sum of each consecutive 12 month period. Ratio of water to fuel for each fuel being fired shall accompany the hourly consumption record.
 - c. Tests of the sulfur content of natural gas being fired in accordance with Subpart GG of the NSPS and the US EPA custom fuel monitoring schedule, approved on July 2, 1998.
 - d. Tests for the sulfur and nitrogen content of all shipments (as defined in Appendix A) of fuel oil delivered to the facility that supply ES-3, ES-4, ES-5 and ES-6.

- e. Calculations to demonstrate compliance with the fuel limitation requirements for any annual period when fuel oil was fired (reference condition III.A.16).
- f. Monthly and annual calculations of nitrogen oxides, sulfur dioxide, and carbon monoxide emissions, water/fuel ratios, monitoring and fuel analysis data, annual emissions calculated monthly as the sum of each consecutive 12 month period.
- g. Results of all stack tests, visible emission evaluations and performance evaluations.
- h. A record of opacity observations, including corrective action or Method 9 observation results.
- i. Continuous monitoring system calibrations and calibration checks.
- j. Scheduled and unscheduled maintenance of the turbines and associated monitoring systems.
- k. Records of operator training.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent (5) years.

(9 VAC 5-80-110, 9 VAC 5-50-50, 40 CFR 60.334-5, and Condition 29 of the 3/28/08 Permit)

C. Testing

- 1. The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.
(9 VAC 5-50-30 and 9 VAC 5-80-110)]
- 2. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ.
(9 VAC 5-80-110)

V. Insignificant Emission Units

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Pollutant Emitted (9 VAC 5-80-720 B.)	Rated Capacity (9 VAC 5-80-720 C.)	Reg. Citation
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Emission Unit No.	Emission Unit Description	Pollutant Emitted (9 VAC 5-80-720 B.)	Rated Capacity (9 VAC 5-80-720 C.)	Reg. Citation
Surry Power Station				
IS-103	Emergency Diesel Generator (Administrative Building)	NO _x	465 HP	C
IS-104	(3) Emergency Diesel-Powered Water Pumps	NO _x	261 HP/each	C
IS-105	ISFS Emergency Diesel Generator	NO _x	67 HP	C
IS-106	Security Emergency Diesel Generator	NO _x	67 HP	C
IS-107	Units 1-3 Back-up Air Compressors (3)	NO _x	5 HP/each	C
IS-108	Aboveground Fuel Oil Storage Tank	VOC	210,000 gallons	B
IS-109	(2) Underground Fuel Oil Storage Tanks	VOC	20,000 gallons/each	B
IS-110	Fuel Oil Storage Tanks	VOC	1 @ 1200 gallons 1 @ 1000 gallons 6 @ 550 gallons	B
IS-111	Fuel Oil Storage Tank (Emergency Water Pumps)	VOC	4800 gallons	B
IS-112	Fuel Oil Storage Tanks (Administration Building, ISFSI, and Security Emergency Generators)	VOC	1 @ 1500 gallons 1 @ 500 gallons 1 @ 285 gallons 1 @ 5 gallons	B
IS-113	Gasoline Storage Tank	VOC	4000 gallons	B
IS-115	Lubricating Oil Systems	VOC	1 @ 22000 gallons 2 Reservoirs (with 3 bowzers each) @ 20,500 gallons each	B
IS-116	Used Lubricating Oil Systems	VOC	1 @ 22000 gallons 1 @ 10,000 gallons 1 @ 1070 gallons	B
IS-117	Sulfuric Acid (99%) Tank	Sulfuric Acid Fumes	9401 gallons	B
IS-118	Hydrazine (35%) Tanks	Hydrazine	2 @ 345 gallons each	B
IS-119	Hydrazine (1.5%) Tanks	Hydrazine	2 @ 564 gallons each	B
IS-121	Plant Welding			A
IS-122	Degreasing Operations	VOC	2 @ 150 gallon each	B
IS-123	Gravel Roads	PM ₁₀		B
IS-124	Plant Painting	VOC		A
IS-125	Grit Blasting	PM ₁₀		B

Emission Unit No.	Emission Unit Description	Pollutant Emitted (9 VAC 5-80-720 B.)	Rated Capacity (9 VAC 5-80-720 C.)	Reg. Citation
IS-126	Radwaste Facility	VOC	500 SCFM Total Tank Vent System	B
IS-127	Paint Shop Solvent Recovery System	VOC	15 gallons/3.5 hrs	B
IS-128	Caterpillar Olympian Emergency Diesel Generator	NO _x	72 HP	C
IS-129	Sullair Backup Compressor (Low-level Intake)	NO _x	250 HP	C
IS-130	Sullair Backup Compressor (Main Station Backup)	NO _x	230 HP	C
IS-131	FAP Security Diesel Generator	NO _x	190 HP	C
IS-132	Emergency Generator (Training Center Sewage Ejector Station)	NO _x	65 HP	C
IS-133	B5B Diesel powered Water Pump (Skid-mounted)	NO _x	78 HP	IS-133
IS-134	B5B Diesel-powered Water Pump (Skid-mounted)	NO _x	78 HP	IS134
Gravel Neck Combustion Turbine Station				
IS-1	Gravel Roads	PM ₁₀	N/A	B
IS-2	Degreaser "Kleer Flow Cleanmaster"	VOC	N/A	B
IS-3	Units 3, 4, 5 and 6 Glycol Heat Exchanger Systems (8 tanks)	Ethylene Glycol CAS 107211	4 each 50 gallon 4 each 125 gallon	B
IS-4	Unit 1&2 Turbine Lube Oil tanks (4 tanks)	VOC	750 gal 1500 gal 1750 gal 3300 gal.	B
IS-5	Unit 2 starter motor fuel oil tank	VOC	203 gal	B
IS-6	Oil/Water Separator System (3 tanks)	VOC	350 gal., 350 gal, 2,000 gal.	B
IS-7	Units 3, 4, 5 and -6 Turbine Lube Oil System (12 tanks)	VOC	(4) 250 gal., (4) 500 gal., and (4) 2000 gal	C
IS-8	Unit 1&2 Emergency Diesel Generator	CO, NO _x , PM ₁₀ , SO ₂ , VOC, HAP's	200 kW	C
IS-9	Distillate Oil Storage Tank	VOC	3,150,000 gal	A
IS-10	Distillate Oil Storage Tank	VOC	3,150,000 gal	A

Emission Unit No.	Emission Unit Description	Pollutant Emitted (9 VAC 5-80-720 B.)	Rated Capacity (9 VAC 5-80-720 C.)	Reg. Citation
IS-11	Unit 1 & 2 No. 2 Fuel Oil Storage Tank C	VOC	310,230 gallons	B
IS-12	Mobile Oil Tank	VOC	500 gal	C
IS-13	Unit 1 & 2 emergency generator fuel oil tank	VOC	171 gal	C
Regulatory citation explanations: A - 9 VAC 5-80-720A - Listed Insignificant Activity B - 9 VAC 5-80-720B - Insignificant due to emission levels C - 9 VAC 5-80-720C - Insignificant due to size of emission unit				

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

VI. Permit Shield & Inapplicable Requirements

Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
40 CFR 60, Subpart Dc	Small Industrial-Commercial-Institutional Steam Generating Units	This Subpart does not apply to the oil-fired boilers because they were constructed prior to the applicability date of June 9, 1989.
40 CFR 60, Subpart GG	Stationary Gas Turbines	This Subpart does not apply to the older combustion turbines (ES1 and ES2) because they were constructed prior to the applicability date of October 3, 1977.
40 CFR 60, Subpart Kb	Volatile Organic Liquid Storage Vessels Standards	This Subpart does not apply to the distillate oil storage tanks because the fuel has a maximum true vapor pressure of less than 15 kPa.
40 CFR 60, Subpart IIII	Stationary Compression Ignition Internal Combustion Engines Standards	This Subpart does not apply to the emergency generators because they were constructed prior to the applicability date of July 11, 2005.
40 CFR 60, Subpart KKKK	Standards of Performance for Stationary Combustion Turbines	This Subpart does not apply to the combustion turbines since the construction of these units commenced before February 18, 2005.
40 CFR 63, Subpart YYYY	National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines	This Subpart does not apply to the combustion turbines since they are considered existing units and are exempt pursuant to 40 CFR 63.6090(b)(4).

Citation	Title of Citation	Description of Applicability
9 VAC 5-40-5220 (Rule 4-37)	VOC Standards for Petroleum Liquid Storage and Transfer Operations	This standard does not apply to the fuel oil storage tanks because it is not applicable to units storing petroleum liquids with a vapor pressure less than 1.5 pounds per square inch.
40 CFR 60.334 b	Monitoring of Operations	NSPS Subpart GG requires monitoring of the nitrogen content of the fuel being fired in the turbines. This requirement has been waived for natural gas by the US EPA Administrator in the US EPA Custom Fuel Monitoring schedule, approved July 2, 1998.

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.

(9 VAC 5-80-140)

VII. General Conditions

A. Federal Enforceability

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.

(9 VAC 5-80-110 N)

B. Permit Expiration

This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.

1. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.
2. If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.

3. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.
4. If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.
5. The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.
(9 VAC 5-80-80 B, C, and F, 9 VAC 5-80-110 D, and 9 VAC 5-80-170 B)

C. Recordkeeping and Reporting

1. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:
 - a. The date, place as defined in the permit, and time of sampling or measurements.
 - b. The date(s) analyses were performed.
 - c. The company or entity that performed the analyses.
 - d. The analytical techniques or methods used.
 - e. The results of such analyses.
 - f. The operating conditions existing at the time of sampling or measurement.
(9 VAC 5-80-110 F)
2. Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.
(9 VAC 5-80-110 F)

3. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than **March 1** and **September 1** of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:
 - a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.
 - b. All deviations from permit requirements. For purpose of this permit, deviations include, but are not limited to:
 - (1) Exceedance of emissions limitations or operational restrictions;
 - (2) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or Compliance Assurance Monitoring (CAM) which indicates an exceedance of emission limitations or operational restrictions; or,
 - (3) Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.
 - c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."
- (9 VAC 5-80-110 F)

D. Annual Compliance Certification

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than March 1 each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

1. The time period included in the certification. The time period to be addressed is January 1 to December 31.
2. The identification of each term or condition of the permit that is the basis of the certification.
3. The compliance status.

4. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.
5. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.
6. Such other facts as the permit may require to determine the compliance status of the source.
7. One copy of the annual compliance certification shall be sent to EPA at the following address:
Clean Air Act Title V Compliance Certification (3AP00)
U.S. Environmental Protection Agency, Region III,
1650 Arch Street
Philadelphia, PA 19103-2029
(9 VAC 5-80-110 K.5)

E. Permit Deviation Reporting

The permittee shall notify the Director, Piedmont Regional Office within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. [Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40.] The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to General Condition IX.C.3 of this permit.

(9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

F. Failure/Malfunction Reporting

In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours after the malfunction is discovered, notify the Director, Piedmont Regional Office by facsimile transmission, telephone or telegraph of such failure or malfunction and shall within 14 days of discovery provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. When the condition causing the failure or

malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, Piedmont Regional Office.

(9 VAC 5-20-180 C)

1. The emission units that have continuous monitors subject to 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not subject to the 14 day written notification.
2. The emission units subject to the reporting and the procedure requirements of 9 VAC 5-40-50 C and the procedures of 9 VAC 5-50-50 C are listed below:
 - a. General Electric Model PG7111-EA simple cycle combustion turbines (ES-3, ES-4, ES-5, and ES-6)
3. Each owner required to install a continuous monitoring system (CMS) or monitoring device subject to 9 VAC 5-40-41 or 9 VAC 5-50-410 shall submit a written report of excess emissions (as defined in the applicable subpart in 9 VAC 5-50-410) and either a monitoring systems performance report or a summary report form, or both, to the board semiannually. All semi-annual reports shall be postmarked by the 30th day following the end of each calendar semi-annual period (June 30th and January 30th). All reports shall include the following information:
 - a. The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h) or 9 VAC 5-40-41 B.6, any conversion factors used, and the date and time of commencement and completion of each period of excess emissions;
 - b. Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the source. The nature and cause of any malfunction (if known), the corrective action taken or preventative measures adopted;
 - c. The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments; and
 - d. When no excess emissions have occurred or the continuous monitoring systems have not been inoperative, repaired or adjusted, such information shall be stated in the report.

All malfunctions of emission units not subject to 9 VAC 5-40-50 C and 9 VAC 5-50-50 C require written reports within 14 days of the discovery of the malfunction.

(9 VAC 5-20-180 C and 9 VAC 5-50-50)

G. Severability

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.

(9 VAC 5-80-110 G.1)

H. Duty to Comply

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is ground for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.

(9 VAC 5-80-110 G.2)

I. Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(9 VAC 5-80-110 G.3)

J. Permit Modification

A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1605, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.

(9 VAC 5-80-190 and 9 VAC 5-80-260)

K. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege.

(9 VAC 5-80-110 G.5)

L. Duty to Submit Information

1. The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.

(9 VAC 5-80-110 G.6)

2. Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.
(9 VAC 5-80-110 K.1)

M. Duty to Pay Permit Fees

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by April 15 of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department.

(9 VAC 5-80-110 H and 9 VAC 5-80-340 C)

N. Fugitive Dust Emission Standards

During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:

1. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;
2. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;
3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or similar operations;
4. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,
5. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-50-90)

O. Startup, Shutdown, and Malfunction

At all times, including periods of startup, shutdown, and soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility

including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

(9 VAC 5-50-20 E and 9 VAC 5-40-20 E)

P. Alternative Operating Scenarios

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1.

(9 VAC 5-80-110 J)

Q. Inspection and Entry Requirements

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

1. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
4. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

R. Reopening For Cause

The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

1. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
2. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
3. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.
(9 VAC 5-80-110 L)

S. Permit Availability

Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.
(9 VAC 5-80-150 E)

T. Transfer of Permits

1. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.
(9 VAC 5-80-160)
2. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)
3. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)

U. Malfunction as an Affirmative Defense

1. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the requirements of paragraph 2 of this condition are met.

2. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:
 - a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.
 - b. The permitted facility was at the time being properly operated.
 - c. During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.
 - d. The permittee notified the Board of the malfunction within two working days following the time when the emission limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other method that allows the permittee to comply with the deadline. This notification fulfills the requirements of 9 VAC 5-80-110 F.2.b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirement under 9 VAC 5-20-180 C.
3. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof.
4. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.
(9 VAC 5-80-250)

V. Permit Revocation or Termination for Cause

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe any permit for any grounds for revocation or termination or for any other violations of these regulations.

(9 VAC 5-80-190 C and 9 VAC 5-80-260)

W. Duty to Supplement or Correct Application

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or

incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.

(9 VAC 5-80-80 E)

X. Stratospheric Ozone Protection

If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.

(40 CFR Part 82, Subparts A-F)

Y. Asbestos Requirements

The permittee shall comply with the requirements of National Emissions Standards for Hazardous Air Pollutants (40 CFR 61) Subpart M, National Emission Standards for Asbestos as it applies to the following: Standards for Demolition and Renovation (40 CFR 61.145), Standards for Insulating Materials (40 CFR 61.148), and Standards for Waste Disposal (40 CFR 61.150).

(9 VAC 5-60-70 and 9 VAC 5-80-110 A.1)

Z. Accidental Release Prevention

If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.

(40 CFR Part 68)

AA. Changes to Permits for Emissions Trading

No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

(9 VAC 5-80-110 I)

BB. Emissions Trading

Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

1. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.

2. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
3. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.
(9 VAC 5-80-110 I)

VIII. Clean Air Interstate Rule (CAIR) Requirements

A. CAIR General Conditions

1. The permittee shall comply with all applicable CAIR requirements (9 VAC 5-140-1010 *et seq.*, 9 VAC 5-140-2010 *et seq.*, 9 VAC 5-140-3010 *et seq.*, and 40 CFR Part 96) by the compliance date in the respective Part of 9 VAC 5 Chapter 140. The CAIR application in Appendix B to this document contains specific conditions and expires upon expiration of this Title V permit.
(9 VAC 5-80-110, 40 CFR Part 96, and 9 VAC 5 Chapter 140)

Appendix A

No. 2 Fuel Oil Transfers – Gravel Neck Power Station

Station Process: The station has two (Tanks A and B) 3,125,000 gallon fuel oil tanks that supply ES-3, ES-4, ES-5 and ES-6. Tanks A and B normally receive fuel oil via the Colonial Pipeline system but can also receive fuel oil by truck transfer. Prior to receiving oil one of the fuel oil tanks is identified as the receiving tank and is isolated from service per the station's operating procedure. The tank is valved and tagged closed until the "shipment" is completed and the oil is sampled from the unit's storage tank after each addition of fuel to the tank per 40 CFR 60.334 (i) and analyzed as outlined in condition III.A.17 of this permit.

Once the station reviews the fuel oil analyses and ensures it meets the Title V fuel oil quality standards listed in condition III.A.19 of this permit, then the fuel oil tank is released for service. In the rare event that the station receives oil by truck transfer, the same process is followed until the entire oil shipment (multiple trucks) volume is transferred to the receiving tank. Copies of the analyses along with the truck manifests and associated volumes are maintained at the station.